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cc:

Subject: Protecting Zooplankton

>From: Gfredlee <Gfredlee@aol.com>

>Date: Sun, 15 Mar 1998 14:12:09 EST

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>Subject: Protecting Zooplankton

>X-Mailer: AOL 3.0 for Windows 95 sub 62

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>Please note the new area code for telephone and fax has been changed to 530

>Via e-mail

> March 15, 1998

>Val Connor,

>Chris Foe

>Vic DeVlaming

>

>Dear Val, Chris and Vic:

>

> Recently I have brought to your attention some of my work on chromium VI

>toxicity issues. I wish to mention that Peter Chapman has accepted a

>condensed version of the report that I sent to you a couple of weeks ago as a

>Learned Discourse in the SETAC News. This should help bring national

>attention to the chromium VI and chromium III regulatory toxicity issues.

>That report as well as backup documents is available on my web site

>(<http://home.pacbell.net/gfredlee/index.htm/>). As you may recall, I have been

>concerned about the under-regulation of chromium VI and chromium III

>associated with just meeting US EPA water quality criteria. These criteria

>are not designed to protect zooplankton from chromium VI toxicity.

>

> My purpose in contacting you now is to bring to your attention that I

>have recently learned that there is significant disagreement in the US EPA

>about the need to protect zooplankton as part of protecting fisheries. In

>discussing these issues with Phil Wood of US EPA Region 9, I questioned him

>about the notion that the US EPA in their criterion support documents can

>state that fish populations are protected when there is obvious toxicity to

>zooplankton. This is the issue with chromium VI and it is the reason why the

>US EPA is not including the toxicity of chromium VI to zooplankton at 0.5

>g/L

>as part of assessing the impact of chromium VI on fish populations.

>According

>to Phil, Chuck Stephan, who lead the US EPA Criteria Development Group for

>freshwaters, does not support protecting zooplankton as part of protecting

>fish populations. Phil indicated that he has been arguing with Chuck for

>years about this issue, however, Chuck is able to prevail. This has
>considerable importance to regulating chlorpyrifos, diazinon and other OP
>pesticide caused toxicity. It is going to be difficult to regulate OP
>pesticides because of their toxicity to zooplankton when the US EPA does not
>support the protection of zooplankton in the Agency's criterion documents.
The

>same can be said about the Central Valley Regional Board with reference to
>chromium VI situations. The literature is clear that chromium VI is toxic to
>some zooplankton at 0.5 g/L. These are not exotic zooplankton, but are
>common daphnid species. Yet, when I tried to raise this issue with the Board
>on protecting zooplankton from chromium VI toxicity, I had a hard time
getting

>the Board and staff to even incorporate chronic toxicity limits into
>University of California, Davis wastewater discharge requirements for
>chromium-polluted groundwater that was to be discharged to Putah Creek. If
>zooplankton are to be protected, there is need to get the federal and state
>agencies to permit wastewater discharges to provide this protection.

>

> I have recently reviewed several US EPA "Fact Sheets" prepared last
>August which indicated that a criterion document for diazinon was to be
>published in the Federal Register on September 30, 1997. Evidently the
Agency

>did not meet its anticipated data publication. I will contact the US EPA
>representative listed on the Fact Sheet for further information.

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> If you have questions on this matter, please contact me.

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>---Fred

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